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BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C. 20590

In the Matter of

AMERICAN SOCIETY OF TRAVEL AGENTS, INC.
and
JOSEPH L. GALLOWAY

Complainants

v.

UNITED AIRLINES, INC., AMERICAN AIRLINES, INC.,
DELTA AIRLINES, INC., NORTHWEST AIRLINES, INC.,
CONTINENTAL AIRLINES, INC., US AIRWAYS, INC.,
TRANS WORLD AIRLINES, INC., AMERICA WEST
AIRLINES, INC., ALASKA AIRLINES, INC., AMERICAN
TRANS AIR, HORIZON AIR INDUSTRIES, INC.,
MIDWEST EXPRESS, INC., AIR CANADA, KLM ROYAL
DUTCH AIRLINES, TACA INTERNATIONAL
AIRLINES, INC. and AIR FRANCE

Respondents

: Docket OST-99-6410 - 21

DEPT OF TRANSPORTATION
OFFICE OF THE
GENERAL COUNSEL
WASHINGTON, D.C. 20590
JAN 24 2000

MOTION TO AMEND COMPLAINT
of the
AMERICAN SOCIETY OF TRAVEL AGENTS, INC.
and
JOSEPH L. GALLOWAY

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January 24, 2000

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and

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The American Society of Travel Agents, Inc. (“ASTA”), and **Joseph L. Galloway**, the Complainants, move to amend the complaint in this proceeding in two respects: (1) the add as a party complainant the travel agency owned by Joseph L. Galloway: Galloway International, Inc. d/b/a **Trans-Continental** Travel, and (2) to amend the prayer for relief to read as follows (new matter is underscored):

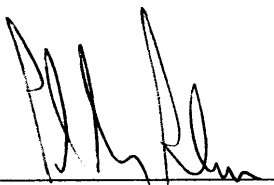
“Accordingly, ASTA and Mr. Galloway respectfully request the Secretary of Transportation to find the reductions in travel agent commission rates from eight to five percent announced by the Respondent airlines to be an unfair method of competition in air transportation or the sale of air transportation, within the meaning of 49 USC 41712, and pursuant to such statute order the air carriers and foreign air carriers to cease and desist immediately from continuing such practices, and for such other and further relief as the Department finds to be in the public interest.”.

The first amendment is sought to put to rest the argument of the respondents that there is no “ticket agent” properly before the Department in this matter. Mr. Galloway’s agency is fully accredited by the Airlines Reporting Corporation and acts as “ticket agent,” as that term is used in the Federal Aviation Act, for virtually every airline in the world.

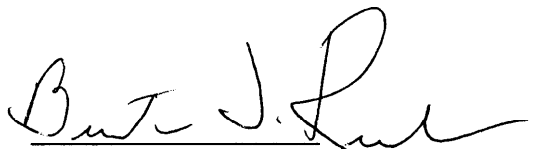
The second amendment is technical in nature, designed to address the claim of some respondents that the Department is limited as to what it can do in this proceeding by the commission-based focus of the prayer for relief initially filed. We do not believe the Department was so limited, but the matter can be put to rest by the additional language proposed in this amendment.

WHEREFORE, the complainants respectfully request that the Complaint in this case be deemed amended as set forth above.

Respectfully submitted,



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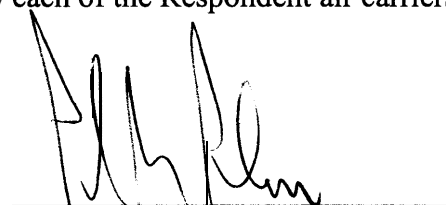


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CERTIFICATE OF SERVICE

I certify that I have this January 24, 2000 served a copy of the above Motion to Amend Complaint of the American Society of Travel Agents, Inc. and Joseph L. Galloway by first class mail upon counsel identified on the answers filed by each of the Respondent air carriers and foreign air carriers in this proceeding.



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